

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 25-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>FANCHAO ZENG</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>ZHONGZHOU LIN,</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy – 1 count)</b>
<b>a/k/a “Zhong Zhou Lin,”</b>	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud – 5 counts)</b>
<b>a/k/a “Lin Zhong Zou”</b>	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
<b>YANPING LI,</b>	<b>:</b>	<b>theft – 3 counts)</b>
<b>a/k/a “Yan Ping Li”</b>	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 57957.
2. PNC Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 6384.
3. TD Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 18409.
4. Hatboro Federal Savings Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 30155.
5. The Dime Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 9888.

6. Trumark Financial was a federally-insured credit union, the deposits of which were insured by the National Credit Union Share Insurance Fund, charter no. 66158.

7. Police and Fire Federal Credit Union was a federally-insured credit union, the deposits of which were insured by the National Credit Union Share Insurance Fund, charter no. 2551.

8. From in or about November 2023 to in or about July 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute a scheme to defraud various banks, including Citizens Bank, PNC Bank, TD Bank, Hatboro Federal Savings Bank, The Dime Bank, Trumark Financial, and Police and Fire Federal Credit Union (collectively, the “Defrauded Banks”), and to obtain monies owned by and under the care, custody, and control of the Defrauded Banks by means of false and fraudulent pretenses, presentations, and promises, in violation of Title 18, United States Code, Section 1344.

#### **MANNER AND MEANS**

It was part of the conspiracy that:

9. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators repeatedly used stolen bank account information and fraudulently-obtained driver’s licenses to access the home equity line of credit (“HELOC”) of a bank

customer, transfer funds from the HELOC to an account that the conspirators controlled, and then withdraw those funds.

10. Defendants FANCHAO ZENG and ZHONGZHOU LIN and their co-conspirators identified bank customers who had a HELOC at a bank (“HELOC Account Holder”).

11. After identifying these HELOC Account Holders, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators submitted fraudulent requests for a change of address for the HELOC Account Holders to the Pennsylvania Department of Transportation, usually via the department’s website.

12. After causing the address of these HELOC Account Holders on file with the Pennsylvania Department of Transportation to be changed, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators used the department’s website to request a replacement driver’s license for the HELOC Account Holder (“Replacement Driver’s License”), which was then mailed to the new address, to which the conspirators had access.

13. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators took steps to prepare the funds available from the HELOCs for theft. Sometimes, they made an online transfer of HELOC funds to an account linked to the HELOC Account Holder. Other times, they created a fake business account in the HELOC Account Holder’s name and transferred HELOC funds to this business account. Other times, the defendants and their conspirators caused the transfer of HELOC funds to linked accounts via phone-initiated transfer requests and in-person at bank branches.

14. After these preparatory steps, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators traveled to branches of the Defrauded Banks with the fraudulently-obtained Replacement Driver's Licenses in order to steal the HELOC funds.

15. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators caused individuals matching the ethnicity of the HELOC Account Holders ("runners") to enter branches of the Defrauded Banks with a Replacement Driver's License.

16. Defendants FANCHAO ZENG and ZHONGZHOU LIN and their co-conspirators caused the runners to withdraw funds belonging to the HELOC Account Holders from the accounts linked to the HELOC Account Holders or to the business accounts.

17. Defendant YANPING LI functioned as one of the runners on multiple occasions, using fraudulently-obtained driver's licenses to withdraw funds belonging to the HELOC Account Holders.

18. The runners made these withdrawals either by making large cash withdrawals or by purchasing official checks in large amounts.

19. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators often cashed the official checks at casinos and used the proceeds to gamble in order to hide their fraud.

20. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their conspirators frequently communicated with one another via cell phone regarding their fraud scheme.



### OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI and their co-conspirators committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 27, 2023, defendants FANCHAO ZENG and YANPING LI traveled to a PNC Bank branch in Philadelphia, Pennsylvania, defendant LI entered the branch, and defendant LI used a fraudulently-obtained Replacement Driver's License to withdraw approximately \$2,000 in cash from an account in the name of Victim Y.M.

On or about December 12, 2023:

2. Defendants FANCHAO ZENG and YANPING LI traveled to a TD Bank branch in Havertown, Pennsylvania, defendant LI entered the branch, and defendant LI used a fraudulently-obtained Replacement Driver's License to withdraw approximately \$7,000 in cash from an account in the name of Victim P.J.

3. At the TD Bank branch in Havertown, Pennsylvania, defendant YANPING LI used the funds from the account in the name of Victim P.J. to purchase an official check in her own name—"Li Yanping"—for approximately \$9,000.

4. On or about December 26, 2023, defendants FANCHAO ZENG and YANPING LI traveled to a TD Bank branch in Devon, Pennsylvania, defendant LI entered the branch, and defendant LI used a fraudulently-obtained Replacement Driver's License to withdraw approximately \$5,000 in cash from an account in the name of Victim C.L.

5. On or about January 5, 2024, defendants FANCHAO ZENG and YANPING LI traveled to a Citizens Bank branch in Morrisville, Pennsylvania, defendant LI

entered the branch, and defendant LI used funds from an account in the name of Victim S.G. and a fraudulently-obtained Replacement Driver's License to purchase an official check in the name of defendant ZHONGZHOU LIN—"Lin Zhong Zhou"—for approximately \$9,000.

6. On or about January 7, 2024, at a Citizens Bank ATM in Flushing, New York, defendant ZHONGZHOU LIN checked the account balance of a fraudulently-opened bank account in the name of "Shan Trading" that was linked to a Citizens Bank account in the name of Victim S.G.

7. On or about January 8, 2024, defendant ZHONGZHOU LIN deposited a \$9,000 Citizens Bank official check made out to "Lin Zhong Zhou" into his personal Bank of America account ending in 9049 via a Bank of America ATM deposit in Flushing, New York.

8. On or about January 11, 2024, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI traveled to a Trumark Financial branch in Philadelphia, Pennsylvania, defendant LI entered the branch, and defendant LI used funds from an account in the name of Victim Y.H. and a fraudulently-obtained Replacement Driver's License to purchase an official check for approximately \$50,000.

9. On or about January 22, 2024, defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI traveled to a PNC Bank branch in Audubon, Pennsylvania, defendant LI entered the branch, and defendant LI used funds from an account in the name of Victim M.W. and a fraudulently-obtained Replacement Driver's License to purchase an official check for approximately \$36,000

10. On or about January 23, 2024, defendants FANCHAO ZENG and YANPING LI entered a Citizens Bank branch in Warrington, Pennsylvania, and defendant LI

used a stolen Replacement Driver's License to open a fraudulent bank account that was linked to the HELOC account held by Victim T.Z.

On or about February 29, 2024:

11. Defendants FANCHAO ZENG and YANPING LI traveled to a Citizens Bank branch in Bensalem, Pennsylvania, defendant LI entered the branch, and defendant LI used a fraudulently-obtained Replacement Driver's License in an unsuccessful attempt to purchase an official check for approximately \$88,000 using funds in an account in the name of Victim A.C.

12. Defendant YANPING LI returned to the Citizens Bank branch in Bensalem and, using the fraudulently-obtained Replacement Driver's License, successfully purchased an official check for approximately \$88,000 using funds from an account in the name of Victim A.C.

13. On or about March 11, 2024, defendant FANCHAO ZENG and an unknown conspirator traveled to a Citizens Bank branch in Philadelphia, Pennsylvania, and the unknown conspirator entered the branch and used funds from an account in the name of Victim X.W. and a fraudulently-obtained Replacement Driver's License to purchase an official check for approximately \$32,000.

On or about April 8, 2024:

14. Defendants FANCHAO ZENG and ZHONGZHOU LIN and an unknown conspirator traveled to a Hatboro Federal Savings Bank branch in Warrington, Pennsylvania, and the unknown conspirator entered the branch and used funds from an account in the name of Victim X.Z. and a fraudulently-obtained Replacement Driver's License to purchase an official check for approximately \$38,000.

15. At the same Hatboro Federal Savings Bank branch in Warrington, Pennsylvania, the unknown conspirator used funds from an account in the name of Victim X.Z. and a fraudulently-obtained Replacement Driver's License to purchase a second official check for approximately \$38,000.

16. On or about April 11, 2024, defendants FANCHAO ZENG and ZHONGZHOU LIN and an unknown conspirator traveled to a PNC Bank branch in Warminster, Pennsylvania, and the unknown conspirator entered the branch and used a fraudulently-obtained Replacement Driver's License to withdraw approximately \$3,000 from an account in the name of Victim X.Z.

On or about April 23, 2024:

17. Defendant ZHONGZHOU LIN and an unknown conspirator traveled to The Dime Bank branch in Hawley, Pennsylvania, and the unknown conspirator entered the branch and used funds from an account in the name of Victim A.J. and a fraudulently-obtained Replacement Driver's License to purchase an official check for approximately \$52,000.

18. At the same The Dime Bank branch in Hawley, Pennsylvania, the unknown conspirator used funds from an account in the name of Victim A.J. and a fraudulent-obtained Replacement Driver's License to purchase a second official check for approximately \$38,000.

19. On or about July 9, 2024, defendant ZHONGZHOU LIN and an unknown conspirator traveled to a Police and Fire Federal Credit Union branch in Philadelphia, Pennsylvania, and the unknown conspirator entered the branch and used funds from an account



in the name of Victim R.L. and a fraudulently-obtained Replacement Driver's License to purchase two official checks, for approximately \$38,000 and \$42,000.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 of Count One is incorporated here.
2. From in or about December 2023 to in or about March 2024, in the

Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody, and control of Citizens Bank by means of materially false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

In was part of the scheme that:

3. Paragraphs 9 through 20 of Count One are incorporated here.

4. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI obtained the account information of customers of Citizens Bank, including Victims S.G., A.C., X.W., and T.Z., without their authorization.

5. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI also obtained Replacement Driver’s Licenses for customers of Citizens Bank, including Victims S.G., A.C., X.W., and T.Z., without their authorization.

6. Defendants FANCHAO ZENG and YANPING LI used a Replacement Driver’s License in Victim S.G.’s name to purchase an official check for approximately \$9,000

using funds in a Citizens Bank business account that the defendants had opened using S.G.'s identity. Defendant ZHONGZHOU LIN deposited this \$9,000 official check into a personal bank account held in his own name at Bank of America.

7. Defendants FANCHAO ZENG and YANPING LI used a Replacement Driver's License in Victim A.C.'s name in an unsuccessful attempt to withdraw approximately \$88,000 from A.C.'s account at Citizens Bank via fraud.

8. Defendants FANCHAO ZENG and YANPING LI used a Replacement Driver's License in Victim A.C.'s name to withdraw approximately \$88,000 from A.C.'s account at Citizens Bank via fraud.

9. Defendants FANCHAO ZENG used a Replacement Driver's License in Victim X.W.'s name to withdraw approximately \$32,000 from X.W.'s account at Citizens Bank via fraud.

10. Defendants FANCHAO ZENG and YANPING LI used a Replacement Driver's License in Victim T.Z.'s name to open a fraudulent bank account linked to T.Z.'s HELOC account at Citizens Bank via fraud.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 2 of Count One is incorporated here.
2. From in or about November 2023 to in or about January 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yang Pin Li,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of PNC Bank by means of materially false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

In was part of the scheme that:

3. Paragraphs 9 through 20 of Count One are incorporated here.
4. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI obtained the account information of customers of PNC Bank, including Victims Y.M. and M.W., without their authorization.
5. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI also obtained Replacement Driver’s Licenses for customers of PNC Bank, including Victims Y.M. and M.W., without their authorization.
6. Defendants FANCHAO ZENG and YANPING LI used a Replacement Driver’s License in Victim Y.M.’s name to withdraw approximately \$2,000 from Y.M.’s account at PNC Bank via fraud.



7. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI used a Replacement Driver's License in Victim M.W.'s name to purchase an official check for approximately \$36,000 using funds in M.W.'s account at PNC Bank.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 4 of Count One is incorporated here.
2. In or about April 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG and  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Hatboro Federal Savings Bank, and to obtain monies owned by and under the care, custody, and control of Hatboro Federal Savings Bank by means of materially false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

In was part of the scheme that:

3. Paragraphs 9 through 20 of Count One are incorporated here.
4. Defendants FANCHAO ZENG and ZHONGZHOU LIN obtained the account information for customers of PNC Bank, including Victim X.Z., without their authorization.
5. Defendants FANCHAO ZENG and ZHONGZHOU LIN also obtained Replacement Driver’s Licenses for customers of PNC Bank, including Victim X.Z., without their authorization.
6. Defendants FANCHAO ZENG and ZHONGZHOU LIN used a Replacement Driver’s License in Victim X.Z.’s name to withdraw approximately \$38,000 from X.Z.’s account at Hatboro Federal Savings Bank via fraud.

7. Defendants FANCHAO ZENG and ZHONGZHOU LIN used a Replacement Driver's License in Victim X.Z.'s name to withdraw another approximately \$38,000 from X.Z.'s account at Hatboro Federal Savings Bank via fraud.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 6 of Count One is incorporated here.
2. On or about January 11, 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Trumark Financial and to obtain monies owned by and under the care, custody, and control of Trumark Financial by means of materially false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

In was part of the scheme that:

3. Paragraphs 9 through 20 of Count One are incorporated here.
4. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI obtained the account information of customers of Trumark Financial, including Victim Y.H., without their authorization.
5. Defendants FANCHAO ZENG, ZHONGZHOU LIN, and YANPING LI also obtained Replacement Driver’s Licenses for customers of Trumark Financial, including Victim Y.H., without their authorization.



6. Defendants FANGHAO ZENG, ZHONGZHOU LIN, and YANPING LI used a Replacement Driver's License in Victim Y.H.'s name to withdraw approximately \$50,000 from Y.H.'s account at Trumark Financial via fraud.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 7 of Count One is incorporated here.
2. In or about July 2024, in the Eastern District of Pennsylvania and elsewhere, defendant

**ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud the Police and Fire Federal Credit Union, and to obtain monies owned by and under the care, custody, and control of the Police and Fire Federal Credit Union by means of materially false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

In was part of the scheme that:

3. Paragraphs 9 through 20 of Count One are incorporated here.
4. Defendant ZHONGZHOU LIN obtained the account information of customers of the Police and Fire Federal Credit Union, including Victim R.L., without their authorization.
5. Defendant ZHONGZHOU LIN also obtained Replacement Driver’s Licenses for customers of the Police and Fire Federal Credit Union, including Victim R.L., without their authorization.
6. Defendant ZHONGZHOU LIN used a Replacement Driver’s License in Victim R.L.’s name to purchase two official checks of approximately \$38,000 and \$42,000 from R.L.’s account at the Police and Fire Federal Credit Union via fraud.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 9 through 20, and Overt Acts 5 through 7, of Count One and Paragraphs 4 through 6 of Count Two are incorporated here.
2. On or about January 7, 2024, in the Eastern District of Pennsylvania and elsewhere, defendant

**ZHONGZHOU LIN,  
a/k/a "Zhong Zhou Lin,"  
a/k/a "Lin Zhong Zou,"**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, Victim S.G.'s name and account numbers associated with S.G.'s checking account at Citizens Bank, during and in relation to bank fraud when he made a balance inquiry for a fraudulently-created account, as charged in Count Two, knowing that the means of identification belonged to a real person.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 6 and 9 through 20, and Overt Act 8, of Count One and Paragraphs 4 through 6 of Count Six are incorporated here.
2. On or about January 11, 2024, in in the Eastern District of Pennsylvania and elsewhere, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, Victim Y.H.’s name and account numbers associated with Y.H.’s savings account at Trumark Financial, during and in relation to bank fraud when they caused the withdrawal of approximately \$50,000, as charged in Count Five, knowing that the means of identification belonged to a real person.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5), and 2.



**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 9 through 20, and Overt Act 10, of Count One and Paragraphs 4, 5, and 10 of Count Two are incorporated here.
2. On or about January 23, 2024, in Warrington, in the Eastern District of Pennsylvania, defendants

**FANCHAO ZENG and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

knowingly and without lawful authority, transferred, possessed, and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, Victim T.Z.’s name and account numbers associated with T.Z.’s HELOC account at Citizens Bank, during and in relation to bank fraud when they caused the opening of a fraudulent bank account, as charged in Count Two, knowing that the means of identification belonged to a real person.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1344, set forth in this indictment, defendants

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a “Zhong Zhou Lin,”  
a/k/a “Lin Zhong Zou,” and  
YANPING LI,  
a/k/a “Yan Ping Li,”**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to, the sum of at least \$1,900,000.

2. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).



*Christine E. Agnew Long*

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DAVID METCALF  
UNITED STATES ATTORNEY

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**FANCHAO ZENG,  
ZHONGZHOU LIN,  
a/k/a "Zhong Zhou Lin,"  
a/k/a "Lin Zhong Zou," and  
YANPING LI,  
a/k/a "Yan Ping Li"**

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**INDICTMENT**

18 U.S.C. § 371 (conspiracy – 1 count)  
18 U.S.C. § 1344 (bank fraud – 5 counts)  
18 U.S.C. § 1028A (aggravated identity theft – 3 counts)  
18 U.S.C. § 2 (aiding and abetting)



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Bail, \$ \_\_\_\_\_

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